

Sheldrake, Sean

From: Sheldrake, Sean
Sent: Wednesday, September 11, 2013 8:32 PM
To: 'Ryan Barth'
Cc: Ben Hung; Bob Wyatt; Carl Stivers; Patty Dost; Alan Gladstone (agladstone@davisrothwell.com); James Peale (jpeale@mfainc.org); Myron Burr (myron.burr@siltronic.com); Peterson, Lance
Subject: RE: NW Natural and Siltronic Response to EPA Letter on Gasco Sediments Site Items 3 and 4 Action Items
Attachments: NW Nat Silt Resp EPA Subs Product Eval Ltr_091013.pdf

Ryan, Bob, Myron, Your letter is acceptable to EPA. Thank you.

S

Sean Sheldrake, Unit Diving Officer, RPM
EPA Region 10, 1200 Sixth Ave., Suite 900
Seattle, WA 98101
206.553.1220 desk
206.225.6528 cell
<http://yosemite.epa.gov/r10/cleanup.nsf/sites/ptldharbor>
<http://www.epa.gov/region10/dive/>

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From: Ryan Barth [mailto:rbarth@anchoragea.com]
Sent: Tuesday, September 10, 2013 1:16 PM
To: Sheldrake, Sean
Cc: Ben Hung; Bob Wyatt; Carl Stivers; Patty Dost; Alan Gladstone (agladstone@davisrothwell.com); James Peale (jpeale@mfainc.org); Myron Burr (myron.burr@siltronic.com); Peterson, Lance
Subject: NW Natural and Siltronic Response to EPA Letter on Gasco Sediments Site Items 3 and 4 Action Items

Sean –

Attached please find NW Natural and Siltronic Corporation's responses and stated agreement to your subject letter dated August 30, 2013. Let me know if you have any questions. Regards.

Ryan Barth, P.E.
Anchor QEA, LLC
rbarth@anchoragea.com
720 Olive Way, Suite 1900
Seattle, Washington 98101
Office: 206.287.9130
Direct: 206.903.3334
Fax: 206.287.9131
Cell: 206.719.3605

From: Sheldrake, Sean [mailto:sheldrake.sean@epa.gov]
Sent: Friday, August 30, 2013 11:22 PM
To: Ryan Barth
Cc: Ben Hung; Bob Wyatt; Carl Stivers; Patty Dost; Alan Gladstone (agladstone@davisrothwell.com); James Peale (jpeale@mfainc.org); Myron Burr (myron.burr@siltronic.com); Peterson, Lance; Conley, Alanna; Alex Liverman (liverman.alex@deg.state.or.us); Audie Huber (audiehuber@ctuir.com); brandy.humphreys@grandronde.org; Brian

Cunninghame (cunninghame@gorge.net); Humphrey, Chip; Cora, Lori; Dan Hafley; Dana Bayuk; Erin Madden (erin.madden@gmail.com); Gail Fricano (gfricano@indecon.com); Genevieve Angle (Genevieve.Angle@noaa.gov); JD Williams (jd@williamsjohnsonlaw.com); Jen Kassakian (jkassakian@indecon.com); peterson.Jennifer@deg.state.or.us; Jeremy_Buck@fws.gov; Jim Anderson (ANDERSON.Jim@deg.state.or.us); Julie Weis (jweis@hk-law.com); Keith Johnson (johnson.keith@deg.state.or.us); Kristin Callahan; Koch, Kristine; Ader, Mark; Matt Johnson (matt@williamsjohnsonlaw.com); Matt McClincy (mcclincy.matt@deg.state.or.us); tosm@yakamafish-nsn.gov; Michael.karnosh@grandronde.org; poulsen.mike@deg.state.or.us; Muza, Richard; Nancy Munn (Nancy.Munn@noaa.gov); Rachel DelVecchio (rdelvecchio@indecon.com); Robert.Neely@noaa.gov; rose@yakamafish-nsn.gov; schwarz.bob@deg.state.or.us; Ted Buerger (ted_buerger@fws.gov); tomd@ctsi.nsn.us; Tom Gainer (gainer.tom@deg.state.or.us)

Subject: RE: Gasco Sediments Site Items 3 and 4 Action Items

Ryan, Bob, Myron,

Thank you for the item 3 & 4 draft memo. Please see EPA's response letter to your draft, attached.

Have a good holiday weekend.

S

Sean Sheldrake, Unit Diving Officer, RPM
EPA Region 10, 1200 Sixth Ave., Suite 900
Seattle, WA 98101
206.553.1220 desk
206.225.6528 cell
<http://yosemite.epa.gov/r10/cleanup.nsf/sites/ptldharbor>
<http://www.epa.gov/region10/dive/>

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From: Ryan Barth [<mailto:rbarth@anchorage.com>]

Sent: Friday, August 09, 2013 3:19 PM

To: Sheldrake, Sean

Cc: Ben Hung; Bob Wyatt; Carl Stivers; Patty Dost; Alan Gladstone (agladstone@davisrothwell.com); James Peale (jpeale@mfainc.org); Myron Burr (myron.burr@siltronic.com); Peterson, Lance

Subject: Gasco Sediments Site Items 3 and 4 Action Items

Attached for your review please find the NW Natural and Siltronic's team proposed text for the Items 3 and 4 described in the below email chain. I have provided in Word format to assist with your review.

Have a good weekend.

Ryan Barth, P.E.
Anchor QEA, LLC
rbarth@anchorage.com
720 Olive Way, Suite 1900
Seattle, Washington 98101
Office: 206.287.9130
Direct: 206.903.3334
Fax: 206.287.9131
Cell: 206.719.3605

From: Sheldrake, Sean [<mailto:sheldrake.sean@epa.gov>]

Sent: Thursday, August 01, 2013 9:38 AM

To: Ryan Barth

Cc: Ben Hung; Bob Wyatt; Carl Stivers; Patty Dost; Alan Gladstone (agladstone@davisrothwell.com); James Peale (jpeale@mfainc.org); Myron Burr (myron.burr@siltronic.com); Peterson, Lance
Subject: RE: Revised Gasco Sediments Site Remedial Alternatives Summary Matrix - Footnote Revisions

That works; thanks Ryan. S

Sean Sheldrake, Unit Diving Officer, RPM
EPA Region 10, 1200 Sixth Ave., Suite 900
Seattle, WA 98101
206.553.1220 desk
206.225.6528 cell
<http://yosemite.epa.gov/r10/cleanup.nsf/sites/ptldharbor>
<http://www.epa.gov/region10/div/>

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From: Ryan Barth [<mailto:rbarth@anchorage.com>]
Sent: Wednesday, July 31, 2013 3:59 PM
To: Sheldrake, Sean
Cc: Ben Hung; Bob Wyatt; Carl Stivers; Patty Dost; Alan Gladstone (agladstone@davisrothwell.com); James Peale (jpeale@mfainc.org); Myron Burr (myron.burr@siltronic.com); Peterson, Lance
Subject: RE: Revised Gasco Sediments Site Remedial Alternatives Summary Matrix - Footnote Revisions

Thanks for confirming Footnotes 1 and 2 are approved.

With regards to Items 3 & 4 schedule, my email below from July 22 at 5pm proposed "Due to ongoing/planned vacations by you and others on our team, we propose providing items 3 and 4 Friday August 9." Does that timing work for EPA?

Ryan Barth, P.E.
Anchor QEA, LLC
rbarth@anchorage.com
720 Olive Way, Suite 1900
Seattle, Washington 98101
Office: 206.287.9130
Direct: 206.903.3334
Fax: 206.287.9131
Cell: 206.719.3605

From: Sheldrake, Sean [<mailto:sheldrake.sean@epa.gov>]
Sent: Tuesday, July 30, 2013 8:54 AM
To: Ryan Barth
Cc: Ben Hung; Bob Wyatt; Carl Stivers; Patty Dost; Alan Gladstone (agladstone@davisrothwell.com); James Peale (jpeale@mfainc.org); Myron Burr (myron.burr@siltronic.com); Peterson, Lance
Subject: RE: Revised Gasco Sediments Site Remedial Alternatives Summary Matrix - Footnote Revisions

Hello Ryan and Bob,

The footnote revisions are consistent with EPA's expectations. Please propose a schedule for items 3 & 4 for EPA review within the next 10 days.

Thank you.

S

Sean Sheldrake, Unit Diving Officer, RPM
EPA Region 10, 1200 Sixth Ave., Suite 900
Seattle, WA 98101
206.553.1220 desk
206.225.6528 cell
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<http://www.epa.gov/region10/dive/>

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From: Ryan Barth [<mailto:rbarth@anchorgea.com>]
Sent: Friday, July 26, 2013 4:37 PM
To: Sheldrake, Sean
Cc: Ben Hung; Bob Wyatt; Carl Stivers; Patty Dost; Alan Gladstone (agladstone@davisrothwell.com); James Peale (jpeale@mfainc.org); Myron Burr (myron.burr@silttronic.com); Peterson, Lance
Subject: Revised Gasco Sediments Site Remedial Alternatives Summary Matrix - Footnote Revisions

Sean –

Attached for your review/comment, please find the revised Gasco Sediments Site remedial alternatives summary matrix with the following two revised footnotes per the email string below:

1 – Evaluation of Alternatives 4 and 5 in the EE/CA will include calculating the cost of adding rigid containment. The EE/CA will also describe the best management practices included in all the alternatives to control releases of contaminants both when rigid containment is and is not used during dredging.

2 – Partial sediment removal under docks (where relevant to the alternative under consideration) followed by capping will be evaluated as a technology option in the EE/CA.

Ryan Barth, P.E.
Anchor QEA, LLC
rbarth@anchorgea.com
720 Olive Way, Suite 1900
Seattle, Washington 98101
Office: 206.287.9130
Direct: 206.903.3334
Fax: 206.287.9131
Cell: 206.719.3605

From: Sheldrake, Sean [<mailto:sheldrake.sean@epa.gov>]
Sent: Tuesday, July 23, 2013 8:11 PM
To: Ryan Barth
Cc: Ben Hung; Bob Wyatt; Carl Stivers; Patty Dost; Alan Gladstone (agladstone@davisrothwell.com); James Peale (jpeale@mfainc.org); Myron Burr (myron.burr@silttronic.com); Peterson, Lance; Cora, Lori
Subject: RE: Resolution of Gasco alternatives matrix

Ryan,

Your schedule proposal is accepted by EPA, with a few minor notes:

Action Item 1: for the revised EE/CA NW Natural should describe BMPs planned to control releases/mobilization of contaminants when rigid containment is not used during dredging.

The 8,000 ppb BaPEq RAL is a placeholder and EPA may select a different RAL as part of the FS process.

The next step concerning how to handle business impacts in the EE/CA cost estimate will involve a discussion between EPA and respondent attorneys.

Thank you.

S

Sean Sheldrake, Unit Diving Officer, RPM
EPA Region 10, 1200 Sixth Ave., Suite 900
Seattle, WA 98101
206.553.1220 desk
206.225.6528 cell
<http://yosemite.epa.gov/r10/cleanup.nsf/sites/ptldharbor>
<http://www.epa.gov/region10/dive/>

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From: Ryan Barth [<mailto:rbarth@anchorgea.com>]

Sent: Monday, July 22, 2013 5:00 PM

To: Sheldrake, Sean

Cc: Ben Hung; Bob Wyatt; Carl Stivers; Patty Dost; Alan Gladstone (agladstone@davisrothwell.com); James Peale (jpeale@mfainc.org); Myron Burr (myron.burr@siltronic.com)

Subject: RE: Resolution of Gasco alternatives matrix

Sean –

As we discussed during our meeting last Friday July 19, we collectively decided there are four action items moving forward associated with continued refinement of the remedial alternatives:

1. Add a footnote to the matrix that states that the Revised EE/CA will include the additional cost for inclusion of rigid containment where the alternative does not include rigid containment. This will only apply to Alternatives 4 and 5.
2. Add a footnote to the matrix that states that partial sediment removal under docks followed by capping will be summarized in the EE/CA as a technology option discussion (versus a whole new alternative).
3. On a separate, parallel track with the matrix, work with EPA to come to consensus on a definition of “accessible” versus “obstructed” substantial product.
4. On a separate, parallel track with the matrix, work with EPA to come to consensus on a definition of structures that will be protected when applying the “accessible” versus “obstructed” substantial product definitions.

NW Natural and Siltronic propose providing EPA with items 1 and 2 this Friday July 26. Due to ongoing/planned vacations by you and others on our team, we propose providing items 3 and 4 Friday August 9. I will work with Lance during development of these items to obtain and integrate CDM Smith feedback. Please let us know if this schedule proposal is approved by EPA.

Ryan Barth, P.E.
Anchor QEA, LLC
rbarth@anchorgea.com
720 Olive Way, Suite 1900
Seattle, Washington 98101
Office: 206.287.9130
Direct: 206.903.3334
Fax: 206.287.9131
Cell: 206.719.3605

From: Sheldrake, Sean [<mailto:sheldrake.sean@epa.gov>]

Sent: Friday, July 19, 2013 1:32 PM

To: Ben Hung; Bob Wyatt; Carl Stivers; John Edwards; Patty Dost; Ryan Barth; Alan Gladstone (agladstone@davisrothwell.com); James Peale (jpeale@mfainc.org); Myron Burr (myron.burr@siltronic.com)

Cc: Cora, Lori; Humphrey, Chip; Koch, Kristine; Muza, Richard

Subject: Resolution of Gasco alternatives matrix

Bob, Ryan, All,

EPA agrees that the matrix provided July 17, as modified by our meeting today is responsive to EPA's June 11, 2012 letter. The set of alternatives to be evaluated in the revised EE/CA will be finalized after EPA provides its full set of comments on the March, 2012 draft EE/CA. A revised table to incorporate July 19 discussions will be provided on the EPA approved schedule (proposal to be provided Monday July 21), along with a proposed schedule for other related alternative details that cannot be included in the table itself.

Thank you.

S

Sean Sheldrake, Unit Diving Officer, RPM
EPA Region 10, 1200 Sixth Ave., Suite 900
Seattle, WA 98101
206.553.1220 desk
206.225.6528 cell

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